

**From:** [Akhter Hossain](#)  
**To:** ["SMITH, MARTIN L"; Mostafa Kamal](#)  
**Cc:** [Jump, Christine](#); [Michael Stephenson](#); [Jana, Michael J](#)  
**Subject:** RE: Building J rinsate results  
**Date:** Friday, March 28, 2014 1:09:37 PM  
**Attachments:** [removed.txt](#)

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Martin,

KDHE reviewed the submitted lab data from rinse water samples at building J. KDHE also reviewed figure 9 of the draft work plan showing the vertical intervals of contaminant presence as identified in your email dated March 27<sup>th</sup> 2014. We agree with your position that concretes directly overlying contaminated soils should be disposed of as waste (indicated as 0-5' and 0-10' depths).

Overlying concrete can be used as backfill where contaminant is located in the 5-10 feet depth, since concrete is not directly in contact with contaminated soil. Therefore this approval is based on the following condition:

1. We agree with your procedure of only reusing concrete and soil as backfill not in contact with contaminated zone.
2. After cutting the concrete floor, if any visible stain is shown, facility will address the application of approved technologies and perform sampling and analysis as needed.
3. Kansas PE should be present during critical activities such as confirmation sampling, etc. Nevertheless, accurate documentation should be retained through photographs, field notes, etc.
4. The facility will respond to EPA's comment adequately.

Akhter Hossain, P.E  
KDHE/BWM

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**From:** SMITH, MARTIN L [mailto:[smith.martin@cleanharbors.com](mailto:smith.martin@cleanharbors.com)]  
**Sent:** Thursday, March 27, 2014 9:34 AM  
**To:** Akhter Hossain; Mostafa Kamal  
**Cc:** Jump, Christine; Michael Stephenson; Jana, Michael J  
**Subject:** RE: Building J rinsate results

Good morning Akhter and Mostafa. I wanted to offer one small clarification on one of your points from yesterday's call.

We agreed on the call that concrete overlying soils directly would be disposed of as waste. The clarification is that ***not all areas where concrete may overlay soil are, in fact, contaminated near the surface***. In fact, the color coding on Figure 9 of the draft work plan shows the contaminant vertical intervals. Many areas have clean soil for the first five feet or more under the surface. As stated in the work plan, these soils and any overlying concrete would be used as fill since no contact with contaminated soil occurs in the shallow soils (and therefore no concrete at the surface is in

contact with contamination). As a measure of caution, the work plan states that we will assume that the interval of contamination actually begins one foot shallower than was actually determined through RFI extent sampling. In offering that, we are insuring that we will not be removing contaminated soils along with clean overburden soils that are to be used for backfill. Similarly, surface gravels and leveling course gravel (under concrete) in these clean areas would also be used as fill.

Please call me if you have any further questions about our approach.

### ***Safety Starts With Me: Live It 3-6-5***

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**Martin L. Smith**

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**From:** Jump, Christine [<mailto:Jump.Chris@epa.gov>]  
**Sent:** Wednesday, March 26, 2014 3:19 PM  
**To:** Michael Stephenson  
**Cc:** SMITH, MARTIN L; Akhter Hossain  
**Subject:** RE: Building J rinsate results

Mike-

Did you collect any lab blanks or do lab analysis of the water source for cleaning the CH buildings?

Thanks.

Chris Jump, L.G.  
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US EPA, Region 7  
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**From:** Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]  
**Sent:** Friday, March 21, 2014 3:17 PM  
**To:** Jump, Christine; John Cook; [ahossain@kdheks.gov](mailto:ahossain@kdheks.gov); [mkamal@kdheks.gov](mailto:mkamal@kdheks.gov)  
**Cc:** [smith.martin@cleanharbors.com](mailto:smith.martin@cleanharbors.com); Tony Carmeli; Lisa Hennessy; Jana, Michael J; STEWART, LON R  
**Subject:** Building J rinsate results

Hello All,

Attached please find the analytical results for rinsate samples collected in Building J following decontamination. This is the format that we intend to use for all rinsate result transmittals, and we welcome your comments as to how we can make these results easy for you to review.

Within this workbook you will find the following worksheets

Contents – A listing of the contents of the work book  
Site Map – A map of the site depicting the location for the building results being transmitted  
Bldg J Figure – a figure depicting the discreet areas and from which rinsate samples were collected  
Bldg J Table – A table of all rinsate results with shading used to indicate detections and exceedances of KDHE Tier II levels  
Bldg J D&F – A table with dioxin and furan analytical results

As we discussed in our conference call on February 27, Clean Harbors is seeking a determination of whether the rubble generated from the removal of the concrete floor within Building J can be used for backfill. Because Bldg J will not be demolished, no other waste streams will be generated other than the concrete floor. Your response on or before March 28 would be greatly appreciated.

Please call myself, Martin Smith or Tony Carmeli with any questions or comments that you have.

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